

Exhibit 7

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 -----X

5 SANDRA GUZMAN,

6 Plaintiff,

NO. 09 CIV. 9323 (BSJ) (RLE)

7 VS.

8 NEWS CORPORATION, NYP
9 HOLDINGS, INC., d/b/a THE
10 NEW YORK POST, and COL ALLAN,
11 in his official and individual
12 Capacities,

13 Defendants.
14 -----X

15 VIDEOTAPED DEPOSITION
16 OF

17 SANDRA GUZMAN

18 New York, New York

19 Thursday, October 13, 2011
20

21 Reported by:

22 AYLETTE GONZALEZ, CLR

23 JOB NO. 42950
24
25

Page 114	Page 115
<p>1 SANDRA GUZMAN-10/13/11</p> <p>2 Q. Just the fact that Pedro is Latino</p> <p>3 makes you think that?</p> <p>4 A. Yes. It wasn't the first time.</p> <p>5 Q. What?</p> <p>6 MR. THOMPSON: She's not finished.</p> <p>7 A. It's not the first time he referred</p> <p>8 to Pedro as a criminal at these morning</p> <p>9 meetings.</p> <p>10 Q. Well, maybe Mr. Allan thinks</p> <p>11 Mr. Pedro Martinez has aspects of his public</p> <p>12 personality that have -- that are -- that open</p> <p>13 him up to that criticism.</p> <p>14 A. Well, I think --</p> <p>15 Q. Could that be true?</p> <p>16 A. I think that I considered that a</p> <p>17 discriminatory remark and it wasn't the first</p> <p>18 time that Mr. Allan was referring to a major</p> <p>19 league baseball player as a criminal.</p> <p>20 On one occasion after I had secured</p> <p>21 an exclusive interview with Mr. Martinez, he</p> <p>22 asked me how it was. And I said it was great.</p> <p>23 He said, did he have a machete or a gun. And</p> <p>24 when you talk about machetes and switchblades</p> <p>25 and Latinos, these are heavily charged,</p>	<p>1 SANDRA GUZMAN-10/13/11</p> <p>2 racially tinged discriminatory code words.</p> <p>3 So, I thought it was discriminatory.</p> <p>4 Q. Did you ever hear Mr. Allan say</p> <p>5 this remark about any other Latino person?</p> <p>6 I'm going to remind you, you're</p> <p>7 under oath.</p> <p>8 A. Have I ever heard Mr. Allan say any</p> <p>9 other remark about any other Latino equating a</p> <p>10 Latino to a criminal?</p> <p>11 Q. Yes.</p> <p>12 A. No, but he has said that all</p> <p>13 Latinos look alike.</p> <p>14 Q. The answer is no, you haven't heard</p> <p>15 Mr. Allan equate any other Latino besides</p> <p>16 Pedro Martinez to a criminal, right?</p> <p>17 A. No.</p> <p>18 Q. And did you know that a few -- a</p> <p>19 couple of months before you published your</p> <p>20 interview of Pedro Martinez, Pedro Martinez</p> <p>21 famously told a reporter that he'd blow the</p> <p>22 reporter's head off for his catcher Mike</p> <p>23 Piazza?</p> <p>24 Did you know that?</p> <p>25 A. No.</p>
Page 116	Page 117
<p>1 SANDRA GUZMAN-10/13/11</p> <p>2 Q. Did understand -- did you know</p> <p>3 Pedro Martinez was reported in that incident</p> <p>4 to have made a hand gesture of a gun with a</p> <p>5 trigger finger with his hand when he did that?</p> <p>6 Did you know that?</p> <p>7 A. No.</p> <p>8 Q. You didn't know that was reported?</p> <p>9 You interviewed Mr. Martinez two</p> <p>10 months after that happened, and you didn't you</p> <p>11 didn't -- you didn't Google Mr. Martinez and</p> <p>12 see what was recently -- had recently been</p> <p>13 written about him? No?</p> <p>14 A. I'm sorry, what are you showing me?</p> <p>15 Q. There's a question pending.</p> <p>16 You didn't Google Mr. Martinez</p> <p>17 before you interviewed him to see what had</p> <p>18 been recently written about him?</p> <p>19 A. I researched.</p> <p>20 Q. Maybe your research would have</p> <p>21 turned up Exhibit 11.</p> <p>22 (Defendant's Guzman Exhibit 11,</p> <p>23 New York Times article, dated</p> <p>24 February 23, 2005, marked for</p> <p>25 identification, as of this date.)</p>	<p>1 SANDRA GUZMAN-10/13/11</p> <p>2 Q. Can you take a look at that,</p> <p>3 please.</p> <p>4 MR. THOMPSON: Can you give us</p> <p>5 extra copies for my associate?</p> <p>6 Mr. Lerner, have you produced this</p> <p>7 document to us? There's no Bates</p> <p>8 number on it.</p> <p>9 MR. LERNER: No, we haven't. It's</p> <p>10 because we just found it on the</p> <p>11 internet.</p> <p>12 MR. THOMPSON: Okay. Take your</p> <p>13 time and review it since they haven't</p> <p>14 produced this document.</p> <p>15 Let the record reflect that that</p> <p>16 document Mr. Lerner has put before</p> <p>17 Ms. Guzman is dated October 11, 2011.</p> <p>18 He maintains he just found it on the</p> <p>19 internet, but this document was</p> <p>20 printed days ago.</p> <p>21 Let the record reflect they have</p> <p>22 not turned this over until 30 seconds</p> <p>23 ago when they showed it to Ms. Guzman</p> <p>24 for the very first time. And as her</p> <p>25 attorney, we have never seen this</p>

1 SANDRA GUZMAN-10/13/11
 2 document. It has not been produced to
 3 us despite the fact that the
 4 Defendants have had this document for
 5 days.
 6 Q. Were you aware, Ms. Guzman, in 2005
 7 of this incident?
 8 A. No.
 9 Q. Is there any other comment that you
 10 have any personal knowledge of Mr. Allan
 11 making that references -- references, anything
 12 derogatory toward Hispanics?
 13 A. Yes.
 14 Q. What is it?
 15 A. I had said earlier that he was
 16 looking up protestors who were protesting a
 17 racist monkey cartoon outside the offices of
 18 The New York Post.
 19 Q. No. I asked if you had heard
 20 Mr. Allan say anything.
 21 You already testified to that and
 22 you did not hear him say that, correct?
 23 A. I did not hear him say that,
 24 correct.
 25 Q. You were told about that remark by

1 SANDRA GUZMAN-10/13/11
 2 alike is what Mr. Allan said about the another
 3 man who works in the office who happens to be
 4 Hispanic, who happens to have the same name.
 5 He is saying that all Hispanics
 6 look alike, and I found that offensive. I
 7 thought that was discriminatory to equate all
 8 Hispanics as people who look alike.
 9 Q. Did you ask him what he meant by
 10 that?
 11 A. No.
 12 Q. Did you tell him that you were
 13 offended by that?
 14 A. No.
 15 Q. Do you know if this is a story
 16 about somebody who spent two weeks in a hotel
 17 and left no tip, right?
 18 A. Um-hum.
 19 Q. And Col Allan says, "We got one of
 20 those in here," right?
 21 A. "We got one of those."
 22 Q. Do you know -- is it possible that
 23 Col Allan --
 24 A. We got one of those people.
 25 Q. -- is referring to --

1 SANDRA GUZMAN-10/13/11
 2 another individual, correct?
 3 A. Correct.
 4 Q. So, my question is: Is there
 5 anything that you personally heard Mr. Allan
 6 say that is -- that was a derogatory comment
 7 about Hispanics?
 8 A. Sure. So, on page 348 of the
 9 Exhibit 7, there was a story about a man named
 10 Juan Rodriguez who was on the move. "He had
 11 checked out of his hotel. He moved to the
 12 Sheraton on Seven Avenue, where there,
 13 housekeeper at last night's hotel says she's
 14 pissed that he stayed for two weeks and left
 15 no tip. This is a man who apparently had won
 16 the lotto."
 17 The reporter was checking in with
 18 cops about priors and domestic abuse
 19 complaints and Col Allan said, we got one of
 20 those in here, and they all probably look
 21 alike. And to me --
 22 Q. They all -- I'm sorry, I don't
 23 think you read that.
 24 A. And they probably look alike. We
 25 got one of those here and they probably look

1 SANDRA GUZMAN-10/13/11
 2 A. He was referring to Juan Rodriguez
 3 that works at The Post.
 4 Q. Well, is it possible he was
 5 referring to people who don't tip?
 6 A. He was referring to Juan Rodriguez
 7 who works at The Post and he was saying they
 8 all look alike.
 9 Q. Well did he say -- have you ever
 10 heard somebody -- have you ever heard a white
 11 person before say that all Latino people look
 12 alike?
 13 A. Yes.
 14 Q. Is that something you've heard?
 15 A. Yes, I have.
 16 Q. And where have you heard that?
 17 A. In the -- in the news right here in
 18 the news meeting.
 19 Q. No, I mean other than in this
 20 incident you're describing. Is that something
 21 that is -- that you've heard as a derogatory
 22 comment about Hispanic Americans?
 23 A. Yes.
 24 Q. When have you heard that?
 25 A. I've heard that throughout the

1 SANDRA GUZMAN-10/13/11
2 years. Do you realize that Hispanic Americans
3 can be black Americans and do you realize that
4 that's one of the ways in which we have been
5 demeaned and we have been made fun of and
6 discriminated against by saying we all look
7 alike?

8 Q. Do you think that Mr. Allan was
9 referring to Mr. Martinez as Latin American or
10 a black American?

11 MR. THOMPSON: Do you mean
12 Martinez or Rodriguez? Martinez and
13 Rodriguez are not the same.

14 Q. Rodriguez.

15 A. Juan Rodriguez happens to be a
16 black Latino, a dark-skinned Latino.

17 Q. And you didn't say anything to
18 Mr. Allan when he said that?

19 MR. THOMPSON: Objection.

20 A. No.

21 Q. How do you know he was referring to
22 the Juan Rodriguez that works at The Post?

23 A. When the story was read by the news
24 editor, he said -- the editor started reading,
25 Juan Rodriguez is on the move. And as soon as

1 SANDRA GUZMAN-10/13/11
2 he finished he says, hey, we got one of those
3 in here, and they probably look alike.

4 He was referring to Juan Rodriguez
5 who worked -- who works in the news room or
6 worked at the time in the news room.

7 Q. Did you take -- and how do you know
8 that that's what Mr. Allan was thinking, if
9 you didn't ask him?

10 A. I just know.

11 Q. Did you take these notes --
12 withdrawn.

13 At the top of the page there are --
14 the pages are dated -- this one is dated
15 12/06/04. Do you see that?

16 A. Yes.

17 Q. So, does that mean that this
18 conversation happened on 12/06/04? You have
19 to answer verbally.

20 A. Yes. Oh, yes.

21 Q. Are there any other comments by Col
22 Allan that you personally heard that you
23 regard as offensive to Hispanic people?

24 A. Not that I can recall at this time.

25 MR. LERNER: It's 2:37 -- I'm

1 SANDRA GUZMAN-10/13/11
2 sorry, 1:36. We, collectively, have
3 not had lunch yet, although the lunch
4 has been served. Do people want to
5 take a break?

6 MR. THOMPSON: Yes.

7 MR. LERNER: And get something to
8 eat?

9 MR. THOMPSON: Yes. All right.
10 So, let's take a break. Okay.

11 MR. LERNER: There's food here.
12 Do you feel like you need more than a
13 half-hour?

14 MR. THOMPSON: No, no since we got
15 sort of sidetracked, let's resume in
16 30 minutes, if that's fine for the
17 Court Reporter, because she's most
18 important, and the videographer.

19 MR. LERNER: Fine.

20 THE VIDEOGRAPHER: The time is
21 1:39 p.m. We're going off the record.

22 (Whereupon, at this time, a
23 lunch break was taken.)
24
25

1 SANDRA GUZMAN-10/13/11
2 AFTERNOON SESSION

3
4 (Time noted: 2:20 p.m.)
5

6 THE VIDEOGRAPHER: The time is
7 2:20 p.m. We're back on the record.
8 video number three.
9

10 SANDRA GUZMAN, resumed and
11 testified as follows:

12 EXAMINATION BY (Cont'd.)

13 MR. LERNER:

14 Q. Ms. Guzman, when you started at The
15 Post, were you provided with a set of
16 standards of business conduct and policies
17 that were applicable at The Post?

18 A. Yes.

19 Q. I'm going to show you a form and
20 ask you if this is Guzman 8. And it's NYP
21 '495.

22 (Defendant's Guzman Exhibit 8,
23 document Bates labeled NYP '495,
24 marked for identification, as of this
25 date.)

Guzman
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----x
SANDRA GUZMAN,

Plaintiff,

vs. 90 Civ. 9323 (BSJ) (RLE)

NEWS CORPORATION, NYP
7 HOLDINGS, INC., d/b/a
THE NEW YORK POST, and
8 COL ALLAN, in his official
and individual capacities,

Defendants.

10 -----x

12 SANDRA GUZMAN
13 New York, New York
14 Monday, February 13, 2012
15 CONTAINS CONFIDENTIAL PORTIONS

24 Reported by: Steven Neil Cohen, RPR
25 Job No. 46187

Page 576	Page 577
<p>1 Guzman</p> <p>2 know, not too many people get 4s and 3s.</p> <p>3 Q. Ms. Guzman, just to be clear, we</p> <p>4 may be misunderstanding one another.</p> <p>5 When I say did you know that in</p> <p>6 2008 you were -- your rating was reduced by</p> <p>7 one level, what I am referring to is the</p> <p>8 level initially recommended by your</p> <p>9 supervisor Joe Rabinowitz versus the level</p> <p>10 that was ultimately assigned to you after</p> <p>11 the APA committee met.</p> <p>12 I am not comparing your final</p> <p>13 review with your self review.</p> <p>14 A. What I remember is -- of the</p> <p>15 process is that -- I am just trying to --</p> <p>16 can you restate the question?</p> <p>17 Q. Okay. Let's go to 2009.</p> <p>18 A. Okay.</p> <p>19 Q. In 2009 your supervisor submitted</p> <p>20 a performance review with a rating and the</p> <p>21 committee, APA committee reduced your level</p> <p>22 by -- your rating by one level, correct?</p> <p>23 A. Well, I know that Joe told me he</p> <p>24 had to reduce it because Col Allan would not</p> <p>25 let him give me a higher number.</p>	<p>1 Guzman</p> <p>2 Q. Okay. Did you know that there was</p> <p>3 a reduction in 2008 of one level that was</p> <p>4 required by the APA review committee?</p> <p>5 A. Yes. These reviews happened but</p> <p>6 Joe ultimately told me that this was his</p> <p>7 decision in 2008.</p> <p>8 In 2009 he was very specific that</p> <p>9 he had to change it begrudgingly because,</p> <p>10 and to use his words, the big guy, meaning</p> <p>11 Col Allan, would not let me get a higher</p> <p>12 number.</p> <p>13 Q. Did he say why Col Allan took that</p> <p>14 position?</p> <p>15 A. He didn't go into details.</p> <p>16 Q. Did he tell you if anybody else</p> <p>17 besides Col Allan was involved in that</p> <p>18 decision?</p> <p>19 A. No. He just said --</p> <p>20 Q. Did he tell you who else was at</p> <p>21 the APA committee meeting?</p> <p>22 A. He just said the big guy. He was</p> <p>23 very specific to point to Col Allan as the</p> <p>24 person telling him --</p> <p>25 Q. I understand.</p>
Page 578	Page 579
<p>1 Guzman</p> <p>2 In 2008 did Mr. Rabinowitz tell</p> <p>3 you why you were reduced by one level?</p> <p>4 A. I remember having a conversation</p> <p>5 with him about the nature of these</p> <p>6 evaluations and how many times he couldn't</p> <p>7 give higher numbers because that would merit</p> <p>8 a salary increase and the number that I was</p> <p>9 trying to negotiate with him because this</p> <p>10 was a negotiation was actually a number</p> <p>11 below from the most excellent number and</p> <p>12 he -- I remember he said to me --</p> <p>13 Q. Ms. Guzman, I am sorry.</p> <p>14 A. -- if you were a 5 you would be</p> <p>15 running this paper.</p> <p>16 Q. The question I asked is, did</p> <p>17 Mr. Rabinowitz tell you why you were reduced</p> <p>18 by one level, it is a yes or no question.</p> <p>19 Either he did or he didn't. If I want to</p> <p>20 know --</p> <p>21 A. Yes.</p> <p>22 Q. -- what the answer was I will</p> <p>23 follow up and ask you to tell us what he</p> <p>24 told you.</p> <p>25 A. Okay.</p>	<p>1 Guzman</p> <p>2 Q. And do you have any other belief</p> <p>3 as to why your rating was reduced in 2008?</p> <p>4 A. I believe that it had to do with</p> <p>5 discrimination. I believe I was treated</p> <p>6 differently than -- I believe I was treated</p> <p>7 differently than my white co-workers.</p> <p>8 Q. How do you know that other people</p> <p>9 were not treated similarly to you with</p> <p>10 respect to APA evaluations in 2008?</p> <p>11 A. Because I saw how perfectly</p> <p>12 talented African American reporters and</p> <p>13 Hispanic employees were treated.</p> <p>14 MR. THOMPSON: She is answering</p> <p>15 your question. This is directly</p> <p>16 responsive --</p> <p>17 MR. LERNER: No, it is not</p> <p>18 responsive.</p> <p>19 THE WITNESS: Yes, it is.</p> <p>20 MR. THOMPSON: Yes, it is.</p> <p>21 MR. LERNER: I don't believe it</p> <p>22 is.</p> <p>23 MR. THOMPSON: It is. She is</p> <p>24 answering your question.</p> <p>25 The question was how do you know</p>

Page 580	Page 581
<p>1 Guzman</p> <p>2 that other people were not treated</p> <p>3 similarly to you with respect to APA</p> <p>4 evaluations in 2008. She is explaining</p> <p>5 it to you, Mr. Lerner.</p> <p>6 Please continue, Ms. Guzman.</p> <p>7 That is no a yes or no question,</p> <p>8 sir.</p> <p>9 Go ahead.</p> <p>10 MR. LERNER: I withdraw the</p> <p>11 question.</p> <p>12 MR. THOMPSON: No. No. No.</p> <p>13 She -- you are not withdrawing. She</p> <p>14 is --</p> <p>15 MR. LERNER: I am going to</p> <p>16 withdraw.</p> <p>17 MR. THOMPSON: No. No. No. No.</p> <p>18 No.</p> <p>19 MR. LERNER: We are not going to</p> <p>20 sit here and have her speechify.</p> <p>21 MR. THOMPSON: It is not</p> <p>22 speechify. She is going to answer that</p> <p>23 question. You can withdraw it all you</p> <p>24 want.</p> <p>25 Please answer that question,</p>	<p>1 Guzman</p> <p>2 Ms. Guzman.</p> <p>3 THE WITNESS: It is not speechify.</p> <p>4 MR. LERNER: Mr. Thompson,</p> <p>5 please --</p> <p>6 THE WITNESS: It is the way that I</p> <p>7 was treated to --</p> <p>8 MR. LERNER: It is my deposition.</p> <p>9 THE WITNESS: No.</p> <p>10 MR. THOMPSON: You can't cut off</p> <p>11 the deposition when she answering</p> <p>12 questions. You can't withdraw questions</p> <p>13 when you don't like the answers,</p> <p>14 Mr. Lerner. That is what is happening</p> <p>15 here.</p> <p>16 THE WITNESS: I was discriminated</p> <p>17 against because I am a woman and because</p> <p>18 I am Hispanic and because I am black.</p> <p>19 BY MR. LERNER:</p> <p>20 Q. Do you know if anybody else had</p> <p>21 their APA rating reduced?</p> <p>22 MR. THOMPSON: Can you get some</p> <p>23 tissues or something?</p> <p>24 We don't need to go off the</p> <p>25 record, Jordan.</p>
Page 582	Page 583
<p>1 Guzman</p> <p>2 THE WITNESS: I can tell you that</p> <p>3 many of my colleagues --</p> <p>4 MR. LIPPNER: You can be a little</p> <p>5 more respectful.</p> <p>6 MR. THOMPSON: Don't raise your</p> <p>7 voice, sir. Ms. Guzman is here crying.</p> <p>8 MR. LIPPNER: That is your doing</p> <p>9 not ours.</p> <p>10 MR. THOMPSON: No. No. No. No.</p> <p>11 sir, it is not.</p> <p>12 THE WITNESS: Actually, it is the</p> <p>13 New York Post's doing. My experiences</p> <p>14 there. My colleagues and I would</p> <p>15 discuss APA evaluations after we</p> <p>16 received them.</p> <p>17 My colleagues and I would talk</p> <p>18 about them. We would talk about what</p> <p>19 they received, what they were told and I</p> <p>20 have knowledge of many African American</p> <p>21 colleagues being treated the same way as</p> <p>22 I was, differently than my white</p> <p>23 colleagues.</p> <p>24 BY MR. LERNER:</p> <p>25 Q. Whose APA evaluations were reduced</p>	<p>1 Guzman</p> <p>2 in 2008?</p> <p>3 A. Reduced?</p> <p>4 Q. Yes.</p> <p>5 A. Or not fair?</p> <p>6 Q. Reduced.</p> <p>7 A. Reduced or not fair?</p> <p>8 Q. Reduced.</p> <p>9 A. This is what I am talking, not</p> <p>10 legitimate. Not capturing the work that we</p> <p>11 did.</p> <p>12 MR. THOMPSON: Ms. Guzman, the</p> <p>13 question is reduced. Okay. If you can</p> <p>14 just focus on that.</p> <p>15 BY MR. LERNER:</p> <p>16 Q. Do you know whose APA evaluations</p> <p>17 in 2008 were reduced? It is a yes or no</p> <p>18 other than yours?</p> <p>19 A. No.</p> <p>20 Q. In 2009 your APA level was reduced</p> <p>21 as we spoke of earlier, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Did anybody tell you that</p> <p>24 reduction was based on retaliation for</p> <p>25 anything you did?</p>

Page 592

1 Guzman
2 Q. Did it say that you were an
3 employee at will at all times?
4 A. I don't remember the exact words.
5 Can I read it again?
6 Q. Did the contract lapse?
7 A. It lapsed.
8 Q. Was it renewed by The New York
9 Post, do you have any further contracts?
10 A. No.
11 Q. Did you regard yourself as an
12 employee at will after that contract lapsed?
13 A. Yes.
14 Q. Did you think you should have been
15 offered a different job at The Post instead
16 of being terminated?
17 A. I wanted to be treated just like
18 Margie Conklin was treated. They -- a white
19 woman in a similar position, her section was
20 reduced in frequency and instead this white
21 woman was -- they created a position for her
22 with additional duties. I wasn't given that
23 opportunity.
24 I was treated differently because
25 I am Hispanic and because I am black.

Page 594

1 Guzman
2 A. Because I was working there at the
3 time and this was the chatter of the water
4 cooler.
5 Q. So this was water cooler chatter?
6 A. Yes.
7 Q. And did you -- did the water
8 cooler chatter include the details regarding
9 Ms. Conklin's contract with The Post?
10 A. No.
11 Q. Do you know what her contract with
12 The Post said?
13 A. No.
14 Q. Have you ever seen her contract?
15 A. No.
16 Q. Did anyone tell you in management
17 that this new position was created for
18 Ms. Conklin?
19 A. No.
20 Q. Did you ask for a new position to
21 be created for you?
22 A. No.
23 Q. Did you think that you should have
24 been offered an editor position on the city
25 desk?

Page 593

1 Guzman
2 Q. Did you understand that there was
3 a position available on the Sunday New York
4 Post that Ms. Conklin was qualified to do
5 when Page 6, the magazine, was shut down?
6 A. No. This position was created for
7 Margie. This position did not exist and
8 they created additional duties for Margie.
9 Q. What was name of that position?
10 A. She was some features director or
11 something. It was --
12 Q. What was the title?
13 A. I don't remember the title. But
14 it was a position above what Steve and
15 Katherine were doing.
16 Q. Was it with respect to the feature
17 section or the Sunday paper?
18 A. It may have been to both. I
19 remember her making contributions to both.
20 Q. And was a -- do you know if there
21 was a vacant position that she filled?
22 A. I know that they created a
23 position for her with new duties that were
24 not there prior to this position.
25 Q. How do you know that?

Page 595

1 Guzman
2 A. I think I should have been given
3 an opportunity to try out, yes. My
4 contributions at the paper, yes.
5 Q. Isn't it a fact that you -- do you
6 think you should have been offered a
7 position to try out on the city desk?
8 A. Sure.
9 Q. Do you know what the city desk
10 editor position that was open in the fall of
11 2009 paid?
12 A. I don't know.
13 Q. Did you know that it paid about
14 40 percent less than you were making?
15 A. I don't know. I come highly
16 qualified and highly experienced.
17 Q. Are you aware of any New York Post
18 editor that was offered a job at a salary
19 40 percent less than they were making
20 before?
21 A. I don't know.
22 Q. Had you ever been tried out on the
23 city desk?
24 A. My first several months at the
25 paper were on the city desk.